

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

FILED

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CLERK US DISTRICT COURT
WESTERN DISTRICT OF TEXAS

BY DEPUTY

UNITED STATES OF AMERICA,
Petitioner,

vs.

Civil Action No.

AN AGGREGATED TOTAL OF \$512,894.00,
MORE OR LESS, IN UNITED STATES
CURRENCY,

A14CV0645SS

2012 VOLKSWAGEN PASSAT,
VIN: 1VWBN7A30CC068407,

BITCOIN ACCOUNT, WALLET ADDRESS:
1LMwVh5mXTkUfpJmqrLc4zfga9y2iYChgi,
CONTAINING 164.57107207 bitcoins,

BITCOIN ACCOUNT, WALLET ADDRESS:
1KasRGy5K1rW8Yxf66S4tBRipBJzMX67Ly,
CONTAINING 28.988387 bitcoins, and

ROYAL SOVEREIGN INTERNATIONAL
MONEY COUNTER, MODEL RBC-1003BK,
SERIAL #K1207LA09668,

Respondents.

VERIFIED COMPLAINT FOR FORFEITURE

NOW COMES Petitioner United States of America, by and through the U. S. Attorney
for the Western District of Texas, pursuant to Rule G of the Supplemental Rules to the Federal
Rules of Civil Procedure, and respectfully states as follows:

I. NATURE OF THE ACTION

1. The United States brings this action, seeking forfeiture to the United States of the
following properties:

- An Aggregated Total of \$512,894, more or less, in United States currency;
- 2012 Volkswagen Passat, VIN: 1VWBN7A30CC068407;
- Bitcoin Account, Wallet Address: 1LMwVh5mXTkUfpJmqrLc4zfga9y2iYChgi,
containing 164.57107207 bitcoins;

- **Bitcoin Account, Wallet Address: 1KasRGy5K1rW8Yxf66S4tBRipBJzMX67Ly, containing 28.988387 bitcoins, and**
- **Royal Sovereign International Money Counter, Model RBC-1003BK, SN: #K1207LA09668**

(hereinafter "the Respondent Properties").

II. STATUTORY BASIS FOR FORFEITURE

2. This is a civil forfeiture action *in rem* brought against the Respondent Properties for violations of 21 U.S.C. §§ 801 *et seq.*, and 18 U.S.C. § 1956, and subject to forfeiture to the United States pursuant to 21 U.S.C. §§ 881(a)(4 & 6) and 18 U.S.C. § 981(a)(1)(A & C) and which state as follows:

21 U.S.C. § 881. Forfeitures

(a) Subject property

The following shall be subject to forfeiture to the United States and no property right shall exist in them:

(4) All conveyances, including aircrafts, vehicles, or vessels, which are used, or are intended to be used, to transport, or in any manner to facilitate the transportation, sale, receipt, possession, or concealment of property.

(6) All moneys, negotiable instruments, securities, or other things of value furnished or intended to be furnished by any person in exchange for a controlled substance . . . , all proceeds traceable to such an exchange, and all moneys, negotiable instruments, and securities used or intended to be used to facilitate any violation of this subchapter.

18 U.S.C. § 981. Civil Forfeiture

(a)(1) The following property is subject to forfeiture to the United States:

(A) Any property, real or personal, involved in a transaction or attempted transaction in violation of section 1956, 1957 or 1960 of this title, or any property traceable to such property.

(C) Any property, real or personal, which constitutes or is derived from proceeds traceable to a violation of . . . any offense constituting "specified unlawful activity" (as defined in section 1956(C)(7) of this title), or a conspiracy to commit such offense.

III. JURISDICTION AND VENUE

3. This Court has jurisdiction over an action commenced by the United States under 28 U.S.C. § 1345 and has jurisdiction over an action for forfeiture under 28 U.S.C. § 1355(a). This Court has *in rem* jurisdiction over the Respondent Properties under 28 U.S.C. §§ 1355(b) and 1395. Venue is proper in this district pursuant to 28 U.S.C. § 1355(b)(1) because the acts or omissions giving rise to the forfeiture occurred in this District.

4. The Respondent Properties were seized in Austin, Texas on or about May 12, 2014, by law enforcement officers of the Austin Police Department (APD) and the Department of Treasury, Internal Revenue Service (IRS). The Respondent Properties have remained in the custody of the IRS and are now within the jurisdiction of the United States District Court, Western District of Texas, Austin Division, and shall remain within the jurisdiction of the court pending litigation of this case.

IV. FACTS IN SUPPORT OF FORFEITURE

5-19. These paragraphs are contained in Appendix A, which has been submitted under seal.

20. Based on the foregoing information, the United States institutes this action to forfeit the Respondent Properties under 21 U.S.C. §§ 881(a)(4 & 6) and 18 U.S.C. § 981(a)(1)(A & C) as the properties were involved in, or are traceable to properties involved in, and/or used or intended to be used to facilitate unlawful drug activities in violation of 21 U.S.C. § 801 *et seq.* and money laundering in violation of 18 U.S.C. § 1956.


V. PRAYER

WHEREFORE, PREMISES CONSIDERED, the United States prays that due process issue to enforce the forfeiture of the Respondent Properties, that due notice pursuant to Rule G(4)

be given to all interested parties to appear and show cause why forfeiture should not be decreed,¹ that a warrant for an arrest *in rem* be ordered, that the Respondent Properties be forfeited to the United States, that the Respondent Properties be disposed of in accordance with the law, and for any such further relief as this Honorable Court deems just and proper.

Respectfully submitted,

ROBERT PITMAN
UNITED STATES ATTORNEY

By: 
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¹ Appendix B, which is being filed along with this Complaint, will be sent to those known to the United States to have an interest in the Respondent Property.

VERIFICATION

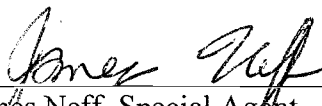
I, JAMES NEFF, declare and state that:

1. I am a Special Agent with the Department of Treasury, Internal Revenue Service, assigned to the Austin Division Office, and am the investigator responsible for the accuracy of the information provided in this litigation.

2. I have read the above Verified Complaint for Forfeiture and know the contents thereof. The information contained in the Verified Complaint for Forfeiture has been furnished by official government sources, and based upon information and belief, the allegations contained in the Verified Complaint for Forfeiture are true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 9, 2014.



James Neff, Special Agent
Department of Treasury,
Internal Revenue Service